

**IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
MIAMI DIVISION**

MDL No. 3076  
Case No. 1:23-md-03076-KMM

**IN RE:**

**FTX Cryptocurrency Exchange Collapse Litigation**

This Document Relates To:

*Garrison, et al. v. Kevin Paffrath, Graham Stephan,  
Andrei Jikh, Jaspreet Singh, Brian Jung,  
Jeremy Lefebvre, Tom Nash, Ben Armstrong,  
Erika Kullberg, and Creators Agency, LLC,*  
Case No. 23-cv-21023

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**JOINT MOTION FOR COURT APPROVAL  
OF CONFIDENTIALITY AND PROTECTIVE ORDER**

Plaintiffs and Defendants Erika Kullberg and Creators Agency LLC (collectively, “Kullberg and Creators”) (Plaintiffs and Kullberg and Creators, the “Parties”), jointly move the Court for entry of an order approving the Parties’ Joint Confidentiality and Protective Order and state:

1. The Parties agree and stipulate to entry of a protective order to cover the exchange of sensitive information in this case.
2. The Parties jointly move the Court for entry of an Order approving the Parties’ Joint Confidentiality and Protective Order.
3. This motion is filed by the Parties in good faith and not for purposes of delay. No party to this action will be prejudiced if this Court grants the relief sought herein.
4. Any other defendant to this litigation may execute an acknowledgement of confidentiality and agree to be bound by the Confidentiality and Protective Order.
5. Pursuant to Local Rule 7.1(a)(2), a proposed Order is attached for the Court’s convenience and a copy will be transmitted in Microsoft Word format via electronic mail to **[sanchez@flsd.uscourts.gov](mailto:sanchez@flsd.uscourts.gov)** pursuant to Rule 3I (6) of the CM/ECF Administrative Procedures

of the Southern District of Florida.

WHEREFORE, the Parties jointly request that the Court issue an order approving the Parties' Joint Confidentiality and Protective Order (attached hereto as Exhibit A) and grant any other such relief as may be just and proper.

**CERTIFICATE OF GOOD FAITH CONFERENCE**

Pursuant to Local Rule 7.1(a)(3), undersigned counsel for the respective Parties represent that the Parties are in agreement with respect to the relief requested herein.

**CONSENT OF COUNSEL FOR DEFENDANT**

Pursuant to Rule 3J (3) of the Administrative Procedures of the United States District Court for the Southern District of Florida (November 13, 2009), the undersigned counsel for Defendants represents to the Court that counsel for Plaintiffs has authorized them to affix their electronic signatures to this joint motion.

DATED: January 23, 2024.

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